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Report to the Federal Communications Commission on Carrier Efforts Toward Attaining Digital TTY Accessibility, and the Status of the Various Technological Solutions, as Provided by CC Docket No. 94-102, In the Matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems

Cal-One Cellular, L.P. ("Cal-One"), by its attorneys, pursuant to the Federal Communications Commission's ("Commission") *Fourth Report and Order* in CC Docket No. 94-102,¹ hereby files a Quarterly Report for the quarter ending June 30, 2002, reporting that Cal-One's digital wireless network is capable of transmitting 911 calls using text telephone ("TTY") devices, and as such, Cal-One is compliant with Commission Rule 20.18(c).

In the *Fourth Report and Order* the Commission established December 31, 2001 as the new deadline for carriers operating digital wireless systems to have obtained all software upgrades and equipment necessary to make their systems capable of transmitting 911 calls from TTY devices. It further established June 30, 2002 as the deadline for carriers to integrate, test and deploy the technology in their systems in conjunction with the public safety community. In order to be assured that the aforementioned deadlines will be met without complication, the Commission required digital wireless carriers to submit Quarterly Reports fifteen days after the end of each quarter.² Until the first quarter of 2002, Cal-One exclusively provided AMPS service in its service area, and therefore, compliance with the December 31, 2001 deadline was not applicable to Cal-One. Nonetheless, in anticipation of its deployment of CDMA technology, Cal-One filed Quarterly Reports with the Commission.³ Cal-One now files this instant report with the Commission.

I. Carrier Background

Cal-One provides analog and on January 8, 2002, deployed digital CMRS wireless service in the California 1 - Del Norte RSA.⁴ Cal-One is compliant with the June 30, 2002 compliance date of Commission Rule 20.18(c). Specifically, during the second quarter of 2002, Cal-One's infrastructure provider, Motorola Inc. ("Motorola"), installed and enabled the same

¹In the Matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, *Fourth Report and Order*, CC Docket No. 94-102, 15 FCC Rcd 25216, 65 Fed. Reg. 82293 (December 28, 2000), ("*Fourth Report and Order*").

²*Id.*

³ Cal-One has filed a total of five quarterly reports with the Commission on this issue. (April 15, 2001, July 15, 2001, October 15, 2001, January 15, 2002, and April 15, 2002.)

⁴Station KNKN233 (CMA336B).

Motorola TTY feature for CDMA cellular infrastructure on the Cal-One switches that Motorola had tested and approved on other carriers' switches prior to June 30, 2002.⁵

II. Access to 911 Through TTY Devices

Cal-One uses analog AMPS and CDMA equipment provided by Motorola for its wireless network infrastructure. During the first quarter of 2002, Motorola advised Cal-One that the Motorola switches on the Cal-One network had the proper software and hardware to support TTY over digital, and would do so when Motorola would make the TTY feature for CDMA available to Cal-One. During the second quarter of 2002, Motorola installed and enabled its TTY feature for CMDA cellular infrastructure on the Motorola switches in the Cal-One network. During the second quarter of 2002, Cal-One requested that Motorola confirm the TTY 911 functionality of its equipment. Motorola's response is appended hereto as **Exhibit A**. Cal-One is not capable of independently verifying the information presented therein, but has no reason to believe it is not accurate, particularly since the digital TTY compatibility requirement is a function of compatible network hardware and software and handsets. If a particular configuration works in one deployment for a particular vendor's infrastructure, it should work equally well in any other deployment. Since the requisite Motorola TTY equipment in Cal-One's network is of the same type and standard as the TTY equipment Motorola tested and approved in other locations, Cal-One's believes its network is in compliance with Commission Rule 20.18(c).

The primary handset providers to Cal-One are Motorola and Nokia. Cal-One has not yet had access to any TTY-compatible handsets, but Motorola, Cal-One's infrastructure provider, tested and approved its TTY feature for CDMA cellular infrastructure with six different handset manufacturers' TTY-compatible CDMA handsets, prior to June 30, 2002.⁶ Further, Cal-One has requested that its handset manufacturers provide information on their progress in releasing commercially available TTY-compatible CDMA digital handsets. Motorola's response is hereto appended as **Exhibit A**. Cal-One is not capable of independently verifying the information presented therein. Cal-One, however, has no reason to believe it is not accurate. Cal-One has not yet received a response to its query from Nokia, and therefore, cannot report on its development activities. In the past, however, Nokia provided this information directly to the Commission in its own quarterly report. Cal-One presumes that Nokia will follow the same procedure for this quarter.

The appended Motorola information is respectfully submitted in response to these issues, as required in the Commission's *Fourth Report and Order* (rel. Dec 14, 2000).

A. Development Activities

- (1) *Network Infrastructure Software Development*
- (2) *Handset Development and Testing Plans*

⁵ See *infra*, Motorola TTY Compatibility Development Status Report, app.

⁶ See Motorola's 5th Quarter 2002 TTY Compatibility Development Status Report, filed with the FCC through the TTY Forum on April 15, 2002.

- (3) *Beta Testing and Lab Testing*
- (4) *Release and General Availability to Carriers of Network Infrastructure Software*
- (5) *Availability to Carriers of Full Acceptance Test Units*
- (6) *Efforts Toward Achieving Digital Wireless Solution Compatibility With Enhanced TTY Devices*

Cal-One has been advised that its digital network, as presently operating, meets the FCC's requirements for TTY compatibility.

B. Testing and Deployment Activities

Cal-One has not had access to TTY-compliant CDMA handsets. With regard to item number 7 however, Cal-One has communicated with the California State Highway Patrol, the designated Public Safety Answering Point ("PSAP") for all wireless carriers in California, to advise them that Cal-One's digital network supports TTY calls made using a TTY-compatible CDMA handset. Cal-One is not responsible for, nor has any control over, the public safety community obtaining digital TTY-compatible equipment. Nonetheless, Cal-One has made the PSAP aware that the TTY Forum (through ATIS) offers a diagnostic test to determine if the PSAP's equipment is digital TTY-compatible.⁷ With respect to item number 8, Motorola has successfully conducted all necessary testing of Cal-One's switch, to the extent that the switch and requisite software is of the same type and standard as the TTY functionality that Motorola tested and approved prior to June 30, 2002. Motorola's response is appended hereto as **Exhibit A**. With respect to item 9, Cal-One has requested information from Motorola; Motorola's response is appended hereto. With respect to item 10, TTY compatibility is available throughout all portions of the Cal-One network where digital CDMA has been deployed.

- (7) *Carrier Coordination of Testing With the PSAP*
- (8) *Carrier Testing Activities, Including Field Testing, Consumer End-to-end Testing, and Other Necessary Tests*
- (9) *Retail Availability of Necessary Consumer Equipment*
- (10) *Geographic Scope of Network Infrastructure Deployment*

III. Conclusion

During the second quarter of 2002, Motorola installed and enabled its TTY feature for CDMA cellular infrastructure on Cal-One's TTY capable switches. Based on this installation, Cal-One is in compliance with the Commission's June 30, 2002 deadline under 20.18(c), to make its digital network capable of transmitting 911 calls from TTY devices. Accordingly, no further quarterly reports will be filed by Cal-One.

⁷ The diagnostic test can be found on the Alliance for Telecommunications Industry Solutions ("ATIS") webpage, www.atis.org, at TWIP (TTY Wireless Inter-Operability with PSAP TTY) Test, last checked on July 8, 2002.

Respectfully Submitted,
Cal-One Cellular, L.P.

Dated: July 15, 2002

/S/ Anna E. Ward
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EXHIBIT A

MOTOROLA TTY COMPATIBILITY DEVELOPMENT STATUS REPORT 2nd Quarter 2002

Product	Standard	Status	Milestones	Progress
CDMA Handset	IS 127-3 IS 733-2	Carrier deployment	IOT: June 2001 UI: October 2001 ROM: December 2001 SA: May 2002	Handset development work complete. V60i and V120c CDMA phones have been approved for shipment.
GSM Handset	TS 26.226 TS 26.230 TR 26.231	Carrier deployment	UI: October 2001 IOT: October 2001 ROM: January 2002 SA: July 2002	Handset development work complete. V60i GSM phone has been approved for shipment. P280i expected to be approved for shipment in July
iDEN Handset		Carrier deployment	Production handsets available to carriers.	Handset work complete.
TDMA Handset	IS 823-A IS 840-A	Carrier deployment	IOT: September 2001 UI: September 2001 ROM: October 2001 SA: April 2002	Handset development work complete. V60i and V120t TDMA phone has been approved for shipment.
CDMA Infrastructure	IS 127-3 IS 733-2	Carrier deployment	FOA Jan 02 Software release available	Carrier testing complete.
iDEN Infrastructure		Carrier deployment	Production software available to carriers	Infrastructure software available for carrier deployment.

Note: Motorola works with its carrier customers to provide them specific information related to their respective products.

Note: IOT is Inter Op Testing with RAM based parts for Character Error Rate testing
UI is User Interface testing with HCO / VCO support
ROM is the availability of ROM based phones. These should be functionally identical to a RAM phone.
SA is Ship Acceptance of production volume quantities

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CERTIFICATE OF SERVICE

I, LaWanda Y. Tyson, a secretary with the law firm of Kurtis & Associates, P.C., do hereby certify that I have this 15th day of July 2002, filed the foregoing “REPORT TO THE FEDERAL COMMUNICATIONS COMMISSION ON CARRIER EFFORTS TOWARD ATTAINING DIGITAL TTY ACCESSIBILITY, AND THE STATUS OF THE VARIOUS TECHNOLOGICAL SOLUTIONS, AS PROVIDED BY CC DOCKET NO. 94-102, IN THE MATTER OF REVISION OF THE COMMISSION’S RULES TO ENSURE COMPATIBILITY WITH ENHANCED 911 EMERGENCY CALLING SYSTEMS” electronically with the Federal Communications Commission’s Electronic Comment Filing System. I have also filed a copy of this report with the Federal Communications Commission’s copy contractor, Qualex International. In addition, a copy of this report has been provided to Melinda Littell of the Commission’s Wireless Telecommunications Bureau.

/S/ LaWanda Y. Tyson
LaWanda Y. Tyson